

**IN THE COMMON PLEAS COURT OF MONTGOMERY COUNTY, OHIO
CRIMINAL DIVISION**

STATE OF OHIO

CASE NO. 2024CR03226

Plaintiff,

JUDGE DANKOF

V.

MOTION TO APPOINT MEMORY EXPERT

JONATHAN LINK

Defendant.

Defendant, Jonathan Link, hereby moves this Court to appoint a memory expert to be used at Trial in the above-captioned matter. Jonathan Link is indigent and cannot afford a memory expert in the instant matter. Attached hereto is the Affidavit of Indigency signed by Mr. Link. The reasons for this Motion are more fully set forth in the Memorandum in Support hereof.

Respectfully submitted;

/s/ Dennis A. Lieberman

Dennis A. Lieberman (0029460)

Flanagan, Lieberman & Rambo

10 North Ludlow Street, Suite 200

Dayton, Ohio 45402

937-223-5200

937-223-3335 Facsimile

lieberman@flrlegal.com

MEMORANDUM IN SUPPORT

Attached hereto is the Financial Disclosure form executed by Mr. Link. He has been incarcerated since the Indictment in the above-captioned matter and has not been gainfully employed. He is now indigent and requires a memory expert to be appointed in this matter. Therefore, it is respectfully requested that this Court order the appointment of Dr. Manges. His rates are \$550.00 per hour and \$3,500.00 for testimony at Trial. His CV is attached hereto as Exhibit B.

A memory expert is crucial in a case which is 25 years old and witnesses will be testifying based upon an aging memory.

Respectfully submitted;

/s/ Dennis A. Lieberman

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Certificate of Service

I hereby certify that on this 7th day of November 2025 this document was electronically filed via the Court's authorized electronic filing system which will send notifications of this filing to all parties.

/s/ Dennis A. Lieberman

Dennis A. Lieberman (0029460)

FINANCIAL DISCLOSURE FORM

(\$25.00 application fee may be assessed—see notice on reverse side)

I. PERSONAL INFORMATION

Applicant's Legal Name Jonathan Link		Applicant's Preferred Name and Pronoun		Date of Birth
Mailing Address Incarcerated		City	Email Address	
State	Zip Code	Case No.	Phone	Cell Phone
SSN Last 4	Gender	Race <input type="checkbox"/> American Indian or Alaskan Native <input type="checkbox"/> Asian <input type="checkbox"/> Black or African American <input type="checkbox"/> Native Hawaiian or Pacific Islander <input type="checkbox"/> Spanish or Latino <input type="checkbox"/> White <input type="checkbox"/> Other		

II. OTHER PERSONS LIVING IN HOUSEHOLD

Name 1)	DOB	Relationship	Name 3)	DOB	Relationship
2)			4)		

III. PRESUMPTIVE ELIGIBILITY

The appointment of counsel is presumed if the person represented meets any of the qualifications below. Please place a check mark if:

Ohio Works First/TANF: ____ SSI: ____ SSD: ____ Medicaid: ____ Poverty Related Veteran's Benefits: ____ Food Stamps: ____

Refugee Settlement Benefits: ____ Incarcerated in State Penitentiary: ____ Committed to a Public Mental Health Facility: ____

Other (please describe): ____ Juvenile: ____ (If juvenile, please continue at Section VIII)

IV. INCOME AND EMPLOYER

	Applicant	Spouse (Do not include spouse's income if spouse is alleged victim)	Total Income
Gross Monthly Employment Income	\$	\$	\$ 0.00
Unemployment, Worker's Compensation, Child Support, Other Types of Income	\$	\$	\$ 0.00
TOTAL INCOME			\$ 0.00
Employer's Name: _____ Phone Number: _____			
Employer's Address: _____			

V. LIQUID ASSETS

Type of Asset	Estimated Value
Checking, Savings, Money Market Accounts	\$
Stocks, Bonds, CDs	\$
Other Liquid Assets or Cash on Hand	\$
TOTAL LIQUID ASSETS	\$ 0.00

VI. MONTHLY EXPENSES

Type of Expense	Amount	Type of Expense	Amount
Child Support Paid Out	\$	Telephone	\$
Child Care (if working only)	\$	Transportation/Fuel	\$
Insurance (medical, dental, auto, etc.)	\$	Taxes Withheld/Owed	\$
Mental/Dental Expenses or Associated Costs of caring for Infirm Family Member	\$	Credit Card/Other Loans	\$
Rent/Mortgage	\$	Utilities (gas, electric, water, sewer, trash)	\$
Food	\$	Other (specify)	\$
EXPENSES	\$ 0.00	EXPENSES	\$ 0.00

VII. DETERMINATION OF INDIGENCY

If applicant's Total Income in Section IV is at or below 187.5% of the Federal Poverty Guidelines, counsel must be appointed. For applicants whose Total Income in Section IV is above 125% of the Federal Poverty Guidelines, see recoupment notice in Section XI. If applicant's Liquid Assets in Section V exceed figures provided in OAC 120-1-03, appointment of counsel may be denied if applicant can employ counsel using those liquid assets. If applicant's Total Income falls above 187.5% of Federal Poverty Guidelines, but applicant is financially unable to employ counsel after paying monthly expenses in Section VI, counsel must be appointed.

VIII. \$25.00 APPLICATION FEE NOTICE


By submitting this Financial Disclosure Form, you will be assessed a non-refundable \$25.00 application fee unless waived or reduced by the court. If assessed, the fee is to be paid to the clerk of courts within 7 days of submitting this form to the entity that will make a determination regarding your indigency. No applicant may be denied counsel based upon failure or inability to pay this fee.

IX. APPLICANT CERTIFICATION

I, Jonathan Link (applicant or alleged delinquent child) state:

1. I am financially unable to retain private counsel without substantial hardship to me or my family.
2. I understand that I must inform the public defender or appointed attorney if my financial situation should change before the disposition of the case(s) for which representation is being provided.
3. I understand that if it is determined by the county or the court that legal representation should not have been provided, I may be required to reimburse the county for the costs of representation provided. Any action filed by the county to collect legal fees hereunder must be brought within two years from the last date legal representation was provided.
4. I understand that I am subject to criminal charges for providing false financial information in connection with this application for legal representation, pursuant to Ohio Revised Code sections 120.05 and 2921.13.
5. I hereby certify that the information I have provided on this financial disclosure form is true to the best of my knowledge.

Name and title of authorized persons completing form on behalf of applicant. Information obtained via phone or video.


Signature of applicant

10-26-2005
Date

X. JUDGE CERTIFICATION

I hereby certify that the above-noted applicant is unable to fill out and/or sign this financial disclosure for the following reason:

_____. I have determined that the party represented meets the criteria for receiving court-appointed counsel.

Judge's signature

Date

XI. NOTICE OF RECOUPMENT

ORC §120.03 allows for county recoupment programs. Any such program may not jeopardize the quality of defense provided or act to deny representation to qualified applicants. No payments, compensation, or in-kind services shall be required from an applicant or client whose income falls below 125% of the federal poverty guidelines. See OAC 120-1-05.

Through recoupment, an applicant or client may be required to pay for part of the cost of services rendered, if he or she can reasonably be expected to pay. See ORC §2941.51(D).

XII. JUVENILE'S PARENTS' INCOME* – FOR RECOUPMENT PURPOSES ONLY – NOT FOR APPOINTMENT OF COUNSEL

	Custodial Parents' Income (Do not include parents' income if parent or relative is alleged victim)	Total
Employment Income (gross)	\$	\$ 0.00
Unemployment, Worker's Compensation, Child Support, Other Types of Income	\$	\$ 0.00
	TOTAL INCOME	\$ 0.00

*Please complete Section VI on page 1 of this form if you would like the court to consider your monthly expenses when determining the amount of recoupment which you can reasonably be expected to pay.



Dr. Kenneth J. Manges & Associates Inc.



CURRICULUM VITAE

📞 513-784-1333



Dr. Kenneth J. Manges

Forensic Psychologist | Vocational Specialist | TEDX Keynote Speaker

Phone (513) 784-1333 | Fax (513) 338-1920

Email: drmanges@gmail.com | Website: drmanges.com

Dr. Manges is a certified forensic psychologist, and court-qualified expert witness for criminal and civil matters, litigation consultant, rehabilitation therapist, vocational expert, clinical therapist, collaboratively trained family and vocational specialist, and speaker. With 40+ years of experience as a problem solver, Dr. Manges is recognized by litigators, judges, individuals, corporations, and HR departments for his preparedness and his ability to communicate. Dr. Manges is known for his ability to convey complex information in a concise, understandable, and memorable way.

➤ [Contact Me](#)

Mission

To offer my expertise in resolving problems that recognize my clients' unique situations. My goal is to help others understand the message I have been asked to present, whether in court as an expert, to an individual struggling with their own personal needs or a group wanting to communicate with their workers and stakeholders.

Strengths

Dr. Manges is a compassionate clinician and evaluator who provides his professional in a myriad of settings. I pride myself on appreciating the needs of the listener, whether that's at trial to a judge or jury, a professional group, a community organization, or an adult learner. I am mindful and considerate of the person or circumstance being spoken about, along with the cultural needs of my audience.

Current Work Experience:

1/86: Present Dr. Kenneth J. Manges & Associates, Cincinnati, Ohio, As a manager, consultant, evaluator, supervisor, clinical psychologist-therapist, forensic psychologist, vocational rehabilitation specialist, and expert witness.

- ▶ **Evaluations of psychological and vocational issues for self-referrals, public, non-profit, and private entities.**
- ▶ **Courtroom testimony regarding interpretation of psychological disorders, differential diagnoses, and vocational viability post injury.**
- ▶ **Economic wage loss evaluations. Consultation and testimony due to psychological issues because of traumatic brain injury, physical or sexual assault, sexual molestation, and physical trauma.**
- ▶ **Independent Medical Examinations due to work injuries for claimants involved in Workers Compensation, as well as employers and claimant attorneys.**
- ▶ **Forensic psychological examinations include competency to stand trial, Not Guilty by Reason of Insanity, incompetency, parental competency, undue influence, genetic disorders, alleged sexual abuse, sexual molestation, wrongful death, and grief, as well as criminal defense, battered person syndrome,**

mitigation at time of sentencing, and wrongful conviction defense.

- ▶ **Individual consultations and treatment. Psychological examinations pre- and post-medical procedure.**
- ▶ **Online teletherapy via phone and/or encrypted and confidential internet video communication.**
- ▶ **Litigation consultation and testimony regarding child custody, best interests of the child, parental alienation, domestic relations, spousal support and parental competency.**
- ▶ **Individual psychotherapy. Job procurement strategies.**
- ▶ **Specialty exams for social security applications; veterans regarding posttraumatic stress and other psychological issues; labor law issues; criminal defense; professional malpractice; workplace injury; and loss of consortium.**
- ▶ **Economic wage loss.**
- ▶ **Quality of life issues due to genetic syndromes such as 22q11.2/3q-29/Velocardiofacial syndrome (VCFS)/DiGeorge**

**syndrome/Spectrum
disorder/developmentally
handicapped/traumatic brain
injury/physical trauma.**

- ▶ **Keynote speaker and training for companies, organizations, agencies, and non-profit groups.**
- ▶ **Fitness for duty and violence screenings for companies and third-party administrators.**
- ▶ **2023 Award in the Psychological Category for Cincinnati, Ohio.**

EDUCATIONAL EXPERIENCES:

- Certification training, Collaborative Family Relations, and Vocational Specialist 02/2019-02/2019.
- Certified International Psychometric Evaluator 01/2018 to present.
- Certified training at Tier 3 for Star Behavioral Health Providers (Military Sensitivity Training) 02/2015 and 03/2017.
- Certification training as a Trainer of Emergency Responders, 03/2004-03/2004.
- Certification training as an Ohio DMH Emergency Responder, 03/2003-03/2003.
- Certification training in Bereavement, 04/2001- 04/2001.
- Certification training in mediation, Harvard University, MA., 02/2000-02/2000.
- Certified Forensic Psychologist, University of Virginia, 4/1984-04/1984.
- Certified Vocational Evaluator, 01/1990-01/1990.
- Ph.D., in Psychology, University of Maryland, 06/1972-06/1974.
- Master's of Science, in Psychology, Brooklyn College, New York, 06/1970-06/1973.
- B.A., in Psychology, Adelphi University, New York, 06/1967-06/1970.

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PROFESSIONAL CREDENTIALS

- Licensed Psychologist, Ohio 1985 to present.
- Licensed Psychologist, West Virginia 1978 to present.
- Diplomate, American Academy of Experts in Traumatic Stress 1998 to present.
- Diplomate, American Board of Vocational Experts 1998 to present.

- Diplomate, American Board of Forensic Examiners 1997 to present.
- Diplomate, American Board of Professional
- Disability Consultants 1992 to present.
- Diplomate, National Center for Crisis Management 1998 to present.

Qualified in Federal, Civil and Military courts.



Past Work Experiences

- 1/86 – Present Dr. Kenneth J. Manges & Associates, Cincinnati, Ohio
Employment as a clinical psychologist, forensic psychologist, vocational rehabilitation specialist and expert witness.
- 9/78 – 1/86 Counseling and Communications Center, Charleston, West Virginia
Employment as a clinical psychologist, forensic psychologist, vocational rehabilitation specialist and expert witness.
- 8/77 – 9/78 Bath – Brunswick Mental Health Center, Bath, Maine
Employment as Director of Consultation and School Psychology contract.
9/74 – 8/77-Wheeler Clinic, Plainville, Connecticut



Employment as a clinical
psychologist

- 8/72 – 9/74 Great Oaks Retardation Center, Silver Springs, Maryland (part time pre-doctoral externship as a psychologist)

INTERNSHIP EXPERIENCES

- ▶ 9/75 – 6-77 Bristol Hospital, Bristol, Connecticut Family therapy
- ▶ 9/71 – 8/72 Hackensack Rehabilitation Center, Hackensack, New Jersey
Director of Sheltered Workshop Program
- ▶ 12/69 – 12/70 Kings County Hospital, Downstate Medical Center, Brooklyn, New York. Clinical trainee
- ▶ 10/69 – 9/70 Family Court Mental Health Clinic, Westbury, New York
Clinical trainee

HOSPITAL AFFILIATIONS

Christ Hospital 1986 to present.

Test Development

Manges-Garmize Behavioral Assessment Scale.

Manges, K., and Garmize, L. Copyright, Great Oaks Center, 1973.

Preliminary Diagnostic Questionnaire.

Copyright, Moriarity, J. (Dr. Manges was the editor and project supervisor.)

Contributions

- Contributing Editor, Journal of Forensic Vocational Assessment 2000 to present Monthly
- Columnist for the American Israelite: Psychologically Speaking Column: 12/2020 to present.
Two-term Past President of the American Board of Vocational Experts (1999-2000)
- Co-author, Working in the Community, 8th Annual Institute 1979.
Former Instructor in Forensic Psychology, Doctoral Program at Union Institute, OH, 1998. Former instructor in psychology, master's program in Psychology at the College of Graduate Studies, WV. 1984.

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